

## **SLAVERY & HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR ENDING 31 MARCH 2019**

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Ubisoft slavery and human trafficking statement for the financial year ending 31 March 2019.

### **1. Structure**

Ubisoft's main business activities are concentrated around the production, publishing and distribution of video games for consoles, PC, smartphones and tablets in both physical and digital formats. Business activities of subsidiaries of Ubisoft Entertainment SA (the parent company which shares are listed on Euronext Paris) may be summarized as follows.

**Production subsidiaries:** these are responsible, under the supervision and within the framework set out by the parent company, for the design and development of the software, including in particular the scenarios, layouts and game rules, as well as the development of design tools and game engines.

**Sales and marketing subsidiaries:** these are responsible, under the supervision and within the framework set out by the parent company, for the worldwide distribution of Ubisoft products in physical format to large retailers and independent wholesalers, and in digital format via dedicated platforms. They are also in charge of implementing local marketing strategies and campaigns associated with game promotion, as decided by the parent company.

In the United Kingdom, Ubisoft Ltd, a wholly-owned subsidiary of Ubisoft Entertainment SA, is a distributor of computer and video games software to the UK and other export markets. Ubisoft Ltd wholly owns Ubisoft Reflections Ltd, Ubisoft CRC and Future Games of London Ltd (a game studio specialising in free to play games for mobile and tablet devices).

### **2. Commitment**

Ubisoft Entertainment SA and its subsidiaries (the "**Group**") is committed to respect human rights, fundamental freedoms, health & safety of its teams, its players and its suppliers in all the countries where it operates. We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business and, in so far as is possible, to requiring our suppliers hold similar ethos. As a group, and at a local level, including at the level of our subsidiaries in the United Kingdom, Ubisoft is committed to working on and, as may be appropriate, improving our practices to help fighting against slavery and human trafficking.

### 3. Code of Conduct

In 2016, the Group finalized a Code of conduct in order to give employees guidelines and key contacts to address sensitive situations they may face on a daily basis. This Code of conduct is distributed to Ubisoft teams since beginning of 2017. A chapter is dedicated to fair treatment of suppliers and partners. In this chapter, it is reminded to all teams that respect of human rights & fundamental freedoms (including forced labor) is part of the criteria to assess suppliers. Also, during fiscal year 18-19, the chapters regarding fight against corruption have been reinforced.

### 4. Duty of Care Plan

#### a. General

In its annual report for fiscal year 18-19, Ubisoft Entertainment SA published a “Duty of Care plan” in accordance with French regulation No. 2017-399 (the “**Duty of Care Regulation**”), which has extra-territorial reach. It focuses on measures to identify and prevent the risk of serious rights abuses regarding human and fundamental freedoms, health and safety of people and the environment, linked to the activities of the contractors or suppliers with whom Ubisoft has an established business relationship. Risks associated with the direct activities of Ubisoft and its subsidiaries are described in the chapter dedicated to Corporate Social Responsibility (“**CSR**”) of the annual report:

[https://www.ubisoft.com/en-US/company/investor\\_center/annual\\_report.aspx](https://www.ubisoft.com/en-US/company/investor_center/annual_report.aspx)

#### b. Ubisoft teams

Concerning Ubisoft teams, all employees are bound by written employment contracts to mitigate risks of forced labor and child labor.

#### c. Supply chain

On the supply side, the Group conducted a risk mapping on all its purchases across the world. This analysis focused on the risk of violations of human rights, work of children, forced labour, conditions of health and safety at work and the risk of severe violations to the environment.

#### *Purchases related to video game production and collectibles*

The Group deployed a specific monitoring regarding production of games and collectibles due to the volumes of purchases, countries of production and direct contact of these products with customers. The production of video games (DVD, boxes) is framed by the 'First parties' specifications that incorporate criteria related to the respect of human rights and fundamental freedoms, health and safety of people and the environment. Nearly all of manufacturing assemblers and logistical providers of Ubisoft are thus certified ISO 9001, guarantor of the process 'Safety and quality', or even ISO 14001, which is environment-specific.



With regard to collectibles, a dedicated compliance team is responsible for selecting contractors who meet the criteria of Ubisoft specifications including financial, quality, and CSR criteria. Thus, Ubisoft team sent reminders to all relevant subcontractors regarding the importance of CSR regulation especially the Duty of Care Regulation. Subcontractors also had to sign “Quality Guidelines” in which they agree to respect fundamental human rights, health and safety at work and the protection of the environment. Compliance with such fundamental rights are also covered through contractual clauses that our main suppliers signed.

Also, all new contractors or subcontractors (with a new order) which are identified as “high risk” are subject to on-site social audits conducted by an independent third party, on the basis of the SA 8000 standard (which incorporates the standards of the United Nations and of the International Labour Organization regarding child labour, forced labour, working time, health and safety, respect for the environment, etc.). Depending on the results of these audits, corrective action plans are passed on to contractors and subcontractors and progress are monitored throughout the relationship by the team in charge (to ensure that practices are improving and correspond to Ubisoft standards).

#### Other purchases

A similar process is being deployed for non-related video game purchases so that Ubisoft procurement teams assess the level of risk for new and existing suppliers regarding their compliance with human rights and fundamental freedom, health and safety conditions and environmental protection. Different steps and degree of diligences are implemented depending on the risks associated with a particular supplier. For relationships for which a risk has been identified, specific tools are deployed (specific contractual clauses and plan of action with the supplier).

#### 5. Whistleblowing system

A whistleblowing system is being put in place so that teams can alert on potential breaches by suppliers and subcontractors regarding human rights, fundamental freedoms, health and safety and environment protection. This system will also concern alerts related to bribery and influence peddling.

Ubisoft’s commitment to social responsibility extends beyond the manufacturing and supply chain process. To find out more about our CSR efforts, please read the CSR chapter in the annual report: [https://www.ubisoft.com/en-US/company/investor\\_center/annual\\_report.aspx](https://www.ubisoft.com/en-US/company/investor_center/annual_report.aspx)



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